



THE CITY OF NEW YORK
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March 1, 2022

BY ECF

Honorable James R. Cho
United States Magistrate Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Brigid Pierce v. City of New York, et al. 21-CV-3482 (PKC)(JRC)

Your Honor:

I am a Senior Counsel in the Special Federal Litigation Division of the New York City Law Department, assigned to the defense of the above-referenced matter on behalf of defendants City of New York, Police Officer Joseph Ryder, Police Officer Steven Kamalic, Police Officer Danielle Moses, and Police Officer Michael Said. I write on behalf of all parties to respectfully request a extension of the fact discovery deadline from March 4, 2022 to April 29, 2022. The parties do not believe that this request conflicts with any other scheduled deadlines. Plaintiff's counsel, Scout Katovich, consents to this extension.

In the complaint, plaintiff alleges, *inter alia*, that on or about June 3, 2020, she was peacefully protesting when the individual officers falsely arrested her and subjected her to excessive force. At the initial conference on November 22, 2021, the Court set a fact discovery deadline of March 4, 2022. On January 24, 2022, the parties submitted a joint status letter outlining the parties' discovery dispute relating to a motion for a protective order and indicating that an extension of the fact discovery deadline was likely needed. On February 7, 2022, the Court held a motion hearing and ultimately granted Defendants' motion for a protective order. The order was signed and filed by all parties on February 8, 2022, and is awaiting the endorsement of the court.

At this time, fact discovery is still ongoing. Defendants produced the documents that were the subject of the protective order on February 22, 2022. Body-worn camera footage has been requested and will be turned over to Plaintiff upon receipt. The parties are still interested in

settlement discussions prior to starting depositions, and Plaintiff indicated she will provide defendants with a demand now that she received the aforementioned documents.

Additionally, the undersigned and Assistant Corporation Counsel Shannon Riordan were recently assigned to substitute Erin Ryan in defending this matter and Defendants filed a Notice of Substitution of Counsel on February 17, 2022 reflecting that change.

For the foregoing reasons, the parties respectfully request that the Court extend the fact discovery deadline to April 29, 2022.

Thank you for your consideration herein.

Respectfully submitted,

Nadine Ibrahim /s/

Nadine Ibrahim
Senior Counsel
Special Federal Litigation Division

cc: All Counsel (By ECF)